

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

KIMIESHA HILL, et al., on behalf of themselves))	
and all others similarly situated,)	
)	Case No. 5:21-cv-00097-SLP
Plaintiffs,)	
)	
v.)	
)	
TOWN OF VALLEY BROOK, et al.,)	
)	
Defendants.)	
)	

JOINT STIPULATION OF THE PARTIES

Plaintiffs, Kimiesha Hill, Jason Garnett, and Kiara McCorkle, and Defendants, the Town of Valley Brook, Michael Stamp, in his official capacity, Lewis Nieman, in his official capacity, and Stephen Haynes¹, in his official capacity, who hereby stipulate to the following facts for the sole purpose of settling the pending litigation:

1. In January 2021, Plaintiffs initiated legal proceedings against former Valley Brook Municipal Court Judge Stephen Haynes. These legal proceedings were initiated in both his official and individual capacities. ECF No. 5.
2. Subsequently, on March 31, 2022, Judge Wyrick dismissed the individual capacity claims against former Judge Stephen Haynes but left intact the official capacity claims. ECF No. 29.
3. The official capacity claims against the Valley Brook Municipal Judge persist.

¹ As set forth below, Defendant Haynes no longer serves as the municipal judge for the Town of Valley Brook.

ECF No. 29.

4. Effective August 1, 2023, Valley Brook appointed a new Municipal Court judge, Blaine Nice, who assumed the role previously held by Stephen Haynes.

5. Consequently, the official capacity claims against the Valley Brook Municipal Court judge remain. Fed. R. Civ. P. 25(d) (“An action does not abate when a public officer who is a party in an official capacity dies, resigns, or otherwise ceases to hold office while the action is pending. The officer’s successor is automatically substituted as a party.”)

6. Notably, Stephen Haynes is no longer a defendant in this ongoing litigation.

Respectfully submitted this 5 day of February, 2024.

/s/Jonathan M. Irwin

Jonathan M. Irwin (OBA # 32636)

Woodrow K. Glass (OBA #15690)

Glass & Tabor LLP

1601 36th Ave NW

Norman, OK 73072

405.253.4031 DIRECT

405.360.7902 FAX

woody@glasstaborlaw.com

Attorneys for Plaintiffs

Jason A. Leckerman

Lisa Swaminathan

Ballard Spahr LLP

1735 Market St. 51st Floor,

Philadelphia, PA 19103

215.864.8266 DIRECT

215.864.8999 FAX

LeckermanJ@ballardspahr.com

SwaminathanL@ballardspahr.com

Admitted pro hac vice

Arthur Ago
Tianna Mays
Lawyers' Committee for Civil Rights
Under Law
1500 K Street NW, Suite 900
Washington, DC 20005
202-662-8600 DIRECT
202-783-0857 FAX
aago@lawyerscommittee.org
tmays@lawyerscommittee.org
Admitted pro hac vice

/s/Courtney D. Powell
Courtney D. Powell
9400 N. Broadway Extension, Suite 600
Oklahoma City, Oklahoma 73114-7423
Telephone: (405) 844-9900
Facsimile: (405) 844-9958
cpowell@spencerfane.com
Attorney for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on the 5 day of February 2024, I electronically submitted the attached document to the Clerk of Court using the ECF System. Based on the records currently on file, the Clerk of the Court will transmit a Notice of Electronic Filing to the ECF registrants on file.

/s/Jonathan Irwin
Jonathan M. Irwin